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**west virginia department of environmental protection**

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Division of Air Quality  
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Charleston, WV 25304  
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Jim Justice, Governor  
Austin Copterton, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

February 24, 2017

Mr. Jon Kimmel  
Addivant USA, LLC  
1000 Morgantown Industrial Park  
Morgantown, WV 26501

RE: Permit Applicability Determination  
Addivant USA, LLC  
South Plant  
Determination No. PD17-015  
Plant ID No. 061-00006

Dear Mr. Kimmel:

It has been determined that your proposed changes to the South Plant located in the Morgantown Industrial Park are not defined, pursuant to §45-13-2.17, as a “modification.” This determination is based on the information (including your emissions calculations) in your Permit Determination Form (PDF) submitted on February 17, 2017 that indicates that the changes do not have a reasonably calculated maximum potential to increase emissions over two (2) lbs/hr OR five (5) tons/year of total Hazardous Air Pollutants (HAPs); six (6) lbs/hour AND ten (10) TPY or one hundred forty-four (144) pounds per calendar day of any regulated pollutant; or *trigger* a substantive requirement of any State or Federal air quality regulation.

Please be aware that any future changes to the facility (or substantive changes to TTP NP production process as described in your PDF) may trigger the requirement to obtain a permit if the changes are defined as a “modification” under 45CSR13.

Should you have any questions, please contact the undersigned engineer at (304) 926-0499 x1208.

Sincerely,



Mike Egnor  
Engineer

cc: Jon Kimmel [jon.kimmel@addivant.com](mailto:jon.kimmel@addivant.com)  
cc: Julie Szymanek [julie.szymanek@addivant.com](mailto:julie.szymanek@addivant.com)